IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA CHARLESTON DIVISION

IN RE: AQUEOUS FILM-FORMING FOAMS PRODUCTS LIABILITY LITIGATION

MDL No. 2:18-mn-2873-RMG

This Document Relates to ALL CASES

JOINT MOTION FOR EXTENSION OF TIME TO SUBMIT A PROPOSED ORDER REGARDING CERTAIN PERSONAL INJURY CLAIMS

Pursuant to Local Civ. Rule 6.01 (D.S.C.), Co-Lead Counsel for Plaintiffs and Defendants respectfully move this Court for a brief extension of time to submit a proposed order addressing the high cholesterol and pregnancy-induced hypertension claims that are currently part of these proceedings. This Motion is based on the following grounds:

- 1. Pursuant to CMO 28, the parties are to submit a proposed order addressing the high cholesterol and pregnancy-induced hypertension claims that are currently part of these proceedings on or before May 1, 2024.
 - 2. The Parties are continuing to meet and confer regarding this issue.
 - 3. This deadline has not been previously extended.
 - 4. The parties request an extension until June 28, 2024 to submit a proposed order.
 - 5. This extension will not affect any existing deadlines.

WHEREFORE, Co-Lead Counsel for Plaintiffs and Defendants respectfully request that the Court extend the time for the parties to submit a proposed order addressing the high cholesterol and pregnancy-induced hypertension claims that are currently part of these proceedings to June 28, 2024.

Dated: April 24, 2024

/s/ Michael A London
Michael A London
Douglas and London PC
59 Maiden Lane, 6th Floor
New York, NY 10038
P: (212) 566-7500
mlondon@douglasandlondon.com

Paul J. Napoli, Esq. Napoli Shkolnik 1302 Avenida Ponce de León Santurce, Puerto Rico 00907 P: (833) 271-4502 pnapoli@nsprlaw.com

Scott Summy
Baron & Budd, P.C.
3102 Oak Lawn Avenue
Suite 1100
Dallas, TX 75219
P: (214) 521-3605
ssummy@baronbudd.com

Joseph F. Rice Motley Rice LLC 28 Bridgeside Blvd. Mount Pleasant, SC 29464 P: (843) 216-9000 jrice@motleyrice.com

Co-Lead Counsel for Plaintiffs

Fred Thompson, III
Motley Rice LLC
28 Bridgeside Blvd.
Mt Pleasant, SC 29464
P: (843)-216-9000
F: (843)-216-9440
fthompson@motleyrice.com

Liaison Counsel for Plaintiffs

Respectfully submitted,

/s/ Michael A. Olsen Michael A. Olsen Mayer Brown LLP 71 South Wacker Drive Chicago, IL 60606 P: (312) 701-7120 molsen@mayerbrown.com

Joseph G. Petrosinelli Williams & Connolly LLP 725 Twelfth Street, N.W. Washington, DC 20005 P: (202) 434-5547 jpetrosinelli@wc.com

Co-Lead Counsel for Defendants

David E. Dukes
Nelson Mullins Riley & Scarborough LLP
1320 Main Street, 17th Floor
Columbia, SC 29201
P: (803) 255-9451
F: (803) 256-7500
david.dukes@nelsonmullins.com

Brian Duffy
Duffy & Young LLC
96 Broad Street
Charleston, SC 29401
P: (843) 720-2044
F: (843) 720-2047
bduffy@duffyandyoung.com

Co-liaison Counsel for Defendants